

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KATHRYN TOWNSEND GRIFFIN, HELEN :  
MCDONALD, and THE ESTATE CERRIGALE :  
TOWNSEND, :  
:  
Plaintiffs, : Docket No. 17-cv-5221 (RJS)  
:  
-against- :  
EDWARD CHRISTOPER SHEERAN, p/k/a ED :  
SHEERAN, ATLANTIC RECORDING :  
CORPORATION d/b/a ATLANTIC RECORDS, :  
SONY/ATV MUSIC PUBLISHING, LLC and :  
WARNER MUSIC GROUP CORPORATION :  
d/b/a ASYLUM RECORDS, :  
:  
Defendants. :  
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**DECLARATION OF  
PATRICK R. FRANK**  
in Opposition to Defendants'  
Ninth Motion *in Limine*

Patrick R. Frank declares that the following statements are true:

1. I am a partner at Frank & Rice, P.A., counsel(s) for the Plaintiffs in this action. I have personal knowledge of, and am fully familiar with, the facts set forth in this Declaration. I respectfully submit this Declaration in opposition to Defendants' Ninth Motion *in Limine*, seeking to exclude evidence and/or testimony at trial relating to the Defendant's, Ed Sheeran's, concert revenues.

2. Annexed as **Exhibit "1"** is a true copy of the First Request for Production Served upon counsel(s) for the Defendant, Ed Sheeran, on or about October 14, 2017, attendant to this litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 28, 2023

  
PATRICK FRANK